REDACTED VERSION
FOR PUBLIC INSEPCTION

HELEIN & MARASHLIAN, LLC
THE COMMLAW GROUP

May 2, 2011

Submitted Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket No. 10-255 – SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT

Dear Ms. Dortch:

During Bandwidth.com Inc.'s ("Bandwidth") March 29, 2011 meeting with Public Safety Staff, staff requested that Bandwidth.com provide some supporting documentation concerning current cost considerations for core routing functions that would be necessary in a next generation 9-1-1 ("NG9-1-1") environment. The examples provided herein demonstrate that there are considerable cost savings opportunities for governmental agencies that are working to assess and ultimately implement NG9-1-1 systems.

REQUEST FOR CONFIDENTIAL TREATMENT

Pursuant to Section 0.459 of the Commission's rules, 47 C.F.R. § 0.459, Bandwidth.com requests that certain information included with this letter be accorded confidential treatment and that such information not be routinely available for public inspection. Specifically, Bandwidth.com requests that the attachment to this letter containing a copy of Bandwidth.com's January 12, 2011 response to the State of Alabama's NG9-1-1 request for proposals ("RFP") be accorded confidential treatment and not be made available to the public. The competitive bidding process in response to the State of Alabama's RFP is still underway and, therefore, the information contained in Bandwidth.com's response to the RFP is highly sensitive and confidential. The information is not generally available to the public and, in fact, is the subject of a non-disclosure provision under the RFP. Disclosure of the pricing and other information contained in the attached document would be competitively harmful to Bandwidth.com, specifically with respect to the pending competitive bidding process in Alabama, but also more generally because it would provide competitors with important information regarding

NG9-1-1 COST INFORMATION

The first set of documentation included in this ex parte is a copy of the proposal dash Carrier Services, LLC ("Dash"), whose assets have subsequently been acquired by Bandwidth.com, submitted on January 12, 2011 in response to the Alabama Next Generation Emergency Network Request for Proposal, RFP#AWB911.RFP.08042010. Because the competitive bidding process is still

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underway, Bandwidth has deemed this information to be highly sensitive and is therefore submitting it under seal. Also included is an April 11, 2011 press release from Cincinnati Bell announcing a Hosted NG9-1-1 service offering. This release from Cincinnati Bell demonstrates that other providers are also employing cost-effective solutions for core routing functions in the NG9-1-1 environment relative to published tariff rates that exist for such functionality in today's PSTN environment.

The initial cost to implement NG9-1-1 and the ongoing operational costs of the system are critical considerations in developing a migration plan and timeline. Based on Bandwidth's real-world experience, it believes that the ongoing operational costs associated with the core call routing aspect of a NG9-1-1 System and the operational costs of PSAP call handling equipment can be materially less than the costs incurred in today's E9-1-1 environment. Bandwidth also offered that the initial startup costs associated with NG9-1-1 can, under certain circumstances, be absorbed and amortized across the life of a service contract thus eliminating a major hurdle that stands in the way of NG9-1-1. Below are examples that support many of the statements made by Bandwidth and contact information for companies that can corroborate this information.

The cost of core call routing can be less than the cost of today's E9-1-1 systems.

The Alabama Wireless Board recently issued an RFP for NG9-1-1 call routing services. When it issued its RFP for call routing services, the board had already selected the Alabama Supercomputer Association to provide a statewide IP network. Alabama currently has two providers of E9-1-1 Services to the 9-1-1 Authorities. One of the two providers, CenturyLink, offers all services required by the 9-1-1 Authorities under a tariff, which is attached herein. As Bandwidth interprets Centurylink's tariff, Centurylink charges $0.09 per month for loading and maintaining records in the selective router and ALI databases.[1] According to the Alabama RFP, there are approximately four (4) million ALI records to manage in Alabama. If the CenturyLink tariffed charges for ALI database record management alone were applied to the Alabama RFP number of 4 million records, the cost for just the database records management component in Alabama would be $4.3 million annually. The Bandwidth (Dash) proposed price for ***all*** routing services, of which database management is just a subset, would work out to be less than a quarter of that price on an annual basis. Subsequent to its initial submission, Bandwidth was invited to present its proposal to the RFP Evaluation Committee along with a select few other vendors that made the first cut. It is Bandwidth's understanding that the first cut was based purely on the capabilities of the vendors and their technical proposals and that the price of the offer was not considered.

Bandwidth also offers a recent announcement by Cincinnati Bell as additional support for its position that costs for core routing functions in a NG9-1-1 environment need not exceed established costs and can actually be dramatically lower in many instances. Cincinnati Bell has announced a roll-out

[1] CenturyTel of Northern Alabama d/b/a CenturyLink, General Subscriber Services Tariff for the State of Alabama, Section 10.4 F (4), Original Sheet 51 available here https://interapp.centurytel.com/resources/pdf/applications/tariffs/alabama/alnorthtariff.pdf. The $.09/mo. rate is derived from the combination of the Selective Routing Database Processing charge of $.01/mo. per record plus the Automatic Location Identification Database Processing charge of $.08/mo. per record.

of NG9-1-1 services in its service territory at approximately the same rates to the 9-1-1 Authorities as the current E9-1-1 system would entail. Additionally, there are other companies that have demonstrated through their proposals to other 9-1-1 Authorities that the cost for NG9-1-1 can be lower than current costs. Bandwidth believes the following companies and their representatives also support Bandwidth's comments concerning the potential cost savings to be realized in a NG9-1-1 environment:

MicroData GIS
Nate Wilcox, CTO
nwilcox@md-911.com
802.748.5503 x845

Solacom
Ray Vilis, VP, iTel Business Unit
rvilis@solacom.com
613.693.0641 x241

TCS
Todd Poremba, Senior Product Manager
tporemba@telecomsys.com
206.792.2001

Emergent Communications
Mike Tedder, CEO
mtedder@emergentcomm.com
203.554.2777

The cost of NG9-1-1 call handling systems can be less than the cost of current, traditional E9-1-1 call handling systems.

As mentioned in our March 29, 2011 meeting, Bandwidth does not offer call handling systems for either E9-1-1 or NG9-1-1. However, since the call routing systems offered by Bandwidth interface directly with the NG9-1-1 call handling system and because the total cost of ownership for 9-1-1 Authorities includes both components, Bandwidth has developed working relationships with a number of NG9-1-1 call handling vendors, including jointly bidding on RFPs with them. Therefore, Bandwidth is aware of the pricing models of the NG9-1-1 call handling vendors and has observed them to be substantially less to acquire and maintain than more traditionally configured E9-1-1 Systems. The price differential can be even greater when the NG9-1-1 call handling systems are deployed in a "hosted" environment. A "hosted" deployment model puts the core of the call handling system in a central, shared environment with standard desktop and laptop computers deployed at the PSAP. By sharing the core components, "hosted" NG9-1-1 call handling dramatically lowers the cost per seat of NG9-1-1 systems.

Finally, several of the vendors are open to offering their systems on a subscription or "software as a service" model. This option allows PSAPs to subscribe to the call handling service on a per-seat, per-month basis with minimal upfront costs. This option could mean that the smaller or more rural 9-1-1 Authorities with fewer financial resources could also quickly migrate to NG9-1-1.

Companies and contacts that can offer further information include the following:

MicroData GIS
Nate Wilcox, CTO
nwilcox@md-911.com
802.748.5503 x845

Solacom
Ray Vilis, VP, iTel Business Unit
rvilis@solacom.com
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Emergent Communications
Mike Tedder, CEO
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203.554.2777

9-1-1 Inc
Allen Amis, CEO
aamis@911-inc.com
303.487.5462

Emergency CallWorx
Craig Dollar, Persident & CEO
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256.520.9111

We hope you find this information helpful in your consideration of appropriate policies and rules to govern NG9-1-1. Bandwidth.com will continue to provide additional information on the issues raised in this proceeding and looks forward to further discussion of those matters with Staff as this proceeding moves forward.

Respectfully submitted,

/s/

Michael P. Donahue
Counsel for Bandwidth.com, Inc.

Enclosures

cc: James Barnett (via email)
David Furth (via email)
Patrick Donovan (via email)
Henning Schulzrinne (via email)
David Siehl (via email)
Greg Rogers (via email)
Ray Paddock (via email)

ATTACHMENT 1

Dash Carrier Services, LLC
Response to
Alabama Next Generation Emergency Network Request for Proposal
RFP#AWB911.RFP.08042010

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ATTACHMENT 2

Cincinnati Bell Press Release

Cincinnati Bell rolls out new 911 technology

Business Courier

Date: Monday, April 11, 2011, 11:57am EDT

Related:

Technology

Cincinnati Bell (NYSE:CBB) has made available a new 911 emergency communication platform.

All emergency 911 dispatch centers in the Cincinnati Bell telephone operating area will be able to upgrade to Next Generation 911 (NG911). Bell said the system does not come with a costly purchase and installation cost, and the cost of maintaining the system is about the same as what emergency centers pay for existing systems.

The Internet protocol-based network will allow 911 calls to be transferred between emergency call centers within the system. It will also "position the dispatch centers to take advantage of the emerging technologies that incorporate today's social media, voice, video and texting," according to a Cincinnati Bell press release.

In 2009, Cincinnati Bell partnered with microDATA and Aculab to deploy an early version on the NG911. Success of the concept led to installation of NG911 in seven 911 dispatch centers in the area.